FULLER, FULLER & ASSOCIATES, P.A.

SUITE 502 12000 BISCAYNE BOULEVARD NORTH MIAMI, FLORIDA 33181

MAIN (305) 891-5199

FACSIMILE: (305) 893-9505

August 25, 2015

Filed Via E-mail to:

The Honorable Analisa Torres
Daniel P. Moynihan U.S. Courthouse
500 Pearl Street – Courtroom 15D
New York, NY 10007-1312

Re: Access 4 All, Inc., et al. v. Manhattan LW Hotel Associates, L.P. 1:15-cv-04993-(AT)(HBP)

Dear JudgeTorres:

An initial conference has been set for September 3, 2015 at 4:15 p.m. The Parties have filed their Civil Case Management Plan and Scheduling Order via e-mail to Chambers at: Torres_nysdchambers@nysd.uscourts.gov. Both Parties Consent to Magistrate and request that the Initial Scheduling Conference be cancelled.

This is a suit for injunctive relief pursuant to the provisions of the Americans With Disabilities Act ("ADA"), 42 U.S.C. § 12181 et seq. The Defendant is the owner of a place of public accommodation as defined under the Americans With Disabilities Act, to wit, a Hotel. The Plaintiffs seek an injunction requiring the removal of architectural barriers to the physically disabled that the Plaintiffs contend are readily achievable, or are otherwise required by Title III of the ADA. The Defendant asserts that certain modifications to the Defendant's facilities are not readily achievable, not required, or would create an undue hardship on the Defendant, and that Plaintiffs lack standing to bring some or all of the pending claims.

Currently there are no contemplated Motions and there is a high likelihood of settlement after the Plaintiffs have conducted a Rule 34 inspection.

Respectfully Submitted,

The Honorable Analisa Torres August 25, 2015 Page 2

Respectfully Submitted,

Layrence A. Fuller, Esq. (LF5450) Fuller, Fuller & Associates, P.A.

12000 Biscayne Boulevard, Suite 502

North Miami, FL 33181 Telephone: (305) 891-5199 Facsimile: (305) 893-9505 lfuller@fullerfuller.com Attorneys for Plaintiffs

Access 4 All, Inc. and Nelson Stern

and

Nelson M. Stern, Esq. (NS8646) Nelson M. Stern Attorney at Law

Co-Counsel for Plaintiff Access 4 All, Inc.

115 East 87th Street, Suite 7C

New York, NY 10128 Telephone: (917) 774-1330 Facsimile: (212) 717-4061

scooterlawyer@aol.com

Attorneys for Plaintiff, Access 4 All, Inc.

John W. Egan, Esq. Seyfarth Shaw, LLP

620 Eighth Avenue

jegan@seyfarth.com

New York, NY 10018-1405 Telephone: (212) 218-5500 Facsimile: (212) 218-5526

and

Minh Vu, Esq.
Seyfarth Shaw, LLP
975 F. Street, N.W.
Washington, DC 20006
Telephone: (202) 828-5337
Facsimile: (202) 641-9279

mvu@seyfarth.com Attorneys for Defendant

GRANTED. The case management conference scheduled for September 3, 2015 is CANCELLED.

SO ORDERED.

Dated: August 26, 2015 New York, New York ANALISA TORRES United States District Judge